

MELINDA HAAG (CABN 132612)
United States Attorney
MIRANDA KANE (CABN 150630)
Chief, Criminal Division
BENJAMIN TOLKOFF (NYBN 4294443)
DAMALI TAYLOR (CABN 262489)
Assistant United States Attorney
450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: Benjamin.Tolkoff@usdoj.gov
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. [CR 12-0198] WHA
Plaintiff,)	STIPULATION AND PROPOSED
v.)	ORDER SEEKING ADDITIONAL TIME
ANGELICA BATO,)	Date: December 28, 2012
Defendant.)	Time: 12:00 p.m.

On December 5, 2012, the Court issued an order entitled Order Re Retrial. The Court ordered that any proposed submissions and authority for revisions or suggestions to jury instructions be submitted to the Court by noon on December 28, 2012.

At the time of the Court's order, the defendant was represented by Douglas Rappaport. Mr. Rappaport has since withdrawn from the case and on December 20, 2012, Mark Vermeulen was appointed to represent Ms. Bato. Because Mr. Vermeulen is new to the case, he cannot provide a thorough submission to the Court by noon on December 28, 2012. Government and defense counsel have conferred and would prefer to file simultaneous submissions to the Court and therefore respectfully request additional time to comply with the Court's order.

1 The parties therefore jointly request that the Court allow the parties to submit responses
2 to the Court's December 5 order on January 4, 2013 by noon.

3 SO STIPULATED.

4 DATED: December 27, 2012.

Respectfully submitted,
MELINDA HAAG
United States Attorneys

6 /s/

7 BENJAMIN TOLKOFF
8 DAMALI TAYLOR
Assistant United States Attorneys

9 DATED: December 27, 2012.


/s/

10 MARK VERMEULEN
Attorney for ANGELICA BATO

11 For the above stated reasons, the parties are hereby granted additional time to comply
12 with the Court's December 5, 2012 order. The parties shall file any submissions in response to
13 the December 5 order no later than noon, January 4, 2013.

14 SO ORDERED.

15 DATED: December 27, 2012.

16 
17 HONORABLE WILLIAM ALSUP
United States District Court Judge